

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

MAURICIO MERCADO

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§

No. 4:10-cr-00459

**UNOPPOSED MOTION FOR PERMISSION TO TRAVEL FOR WORK
OUTSIDE THE SOUTHERN DISTRICT OF TEXAS**

TO THE HONORABLE KENNETH M. HOYT:

Defendant, MAURICIO MERCADO, by and through his undersigned attorney, Charles Flood, and filed this unopposed motion for permission to travel for work, saying for cause as follows:

- 1) Defendant is employed as an inspector by Wicks and Associates Industrial Services, an oil field services company. His employer has requested to temporarily re-assign him to the Sinclair, Wyoming for approximately nine (9) months.
- 2) Defendant requests permission to travel to Sinclair, Wyoming as part of a work assignment at the Sinclair Refinery located at 100 Lincoln Hwy., Sinclair Wyoming 82334. Pending completion of this work assignment, Defendant will reside at 115 E. Miller St. Rawlins WY, 82301.
- 3) U.S. Pretrial Service Officer Andrew Flores and Assistant U.S. Attorney Lisa Collins are unopposed to this request.

WHEREFORE, PREMISES CONSIDERED, Defendant MAURICIO MERCADO respectfully request that this Court grant his unopposed motion for permission to travel to Sinclair, Wyoming returning on or about October 1, 2022.

Respectfully submitted,

/s/ Charles Flood
Charles Flood
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CERTIFICATE OF CONFERENCE

Counsel has conferred with Assistant U.S. Attorney Jill Stotts and Pre-Trial Officer, Andrew Flores who are both unopposed to Defendant's request to travel for work.

/s/ Charles Flood

Charles Flood

CERTIFICATE OF SERVICE

I hereby certify that on February 22, 2022, I electronically filed the foregoing document with the Clerk of Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Charles Flood

Charles Flood